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APR 1 8 2013

Clerk, U.S. District Court District Of Montana Billings

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ATTORNEY FOR PLAINTIFF UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MONTANA

HELENA DIVISION

UNITED STATES OF AMERICA.

Plaintiff,

VS.

WILLIAM FREDRICK SCHROEDER,

Defendant.

CR 13-09-H- SEH

INDICTMENT

COERCION AND ENTICEMENT

Title 18 U.S.C. § 2422(b)

(Count I)

(Penalty: Mandatory minimum

10 years to life, \$175,000 fine, and five years to lifetime supervised

release)

RECEIPT OF CHILD **PORNOGRAPHY**

Title 18 U.S.C. $\S 2252(a)(2)$ and (b)

(Count II)

(Penalty: Mandatory minimum five to 20 years imprisonment, \$250,000 fine, and five years to lifetime supervised release)

FORFEITURE Title 18 U.S.C. § 2253(a)

THE GRAND JURY CHARGES:

COUNT I

That on about a period between February 8, 2013 and February 13, 2013, in Lewis and Clark County, in the State and District of Montana, the Defendant, WILLIAM FREDRICK SCHROEDER, knowingly used a facility and means of interstate commerce, namely a cellular telephone, to persuade, induce, entice, coerce and attempt to persuade, induce, entice, and coerce a minor, namely "S," whose date of birth is X/XX/1999, to engage in a sexual activity for which the Defendant can be charged with a criminal offense under Mont. Code Ann. §§ 45-5-502 and 503, all in violation of 18 U.S.C. § 2242(b).

COUNT II

That on or about a period between December 2012 and January 2013, in Lewis and Clark County, in the State and District of Montana, the Defendant, WILLIAM FREDRICK SCHROEDER, knowingly received any visual depiction that had been shipped in and affecting interstate and foreign commerce by any means, including by a cellular telephone, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct, in violation of 18 U.S.C. §§ 2252(a)(2).

FORFEITURE ALLEGATION

As a result of the commission of the crimes described above, and upon his conviction, the Defendant, WILLIAM FREDRICK SCHROEDER, shall forfeit to the United States, all right, title and interest in the following described property that represents property used to commit the offenses:

Grey/Black Verizon Samsung Cell Phone Serial # 268435460816677286, seized from the Defendant on February 13, 2013.

Black LG Flip Cell Phone, Straight Talk, seized from the Defendant on February 13, 2013.

A TRUE BILL.

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FOREPERSON	

MICHAEL W. COTTER
United States Attorney
Attorney for Plaintiff

KRIS A. McLEAN

Criminal Chief Assistant U.S. Attorney

Attorney for Plaintiff

Warrant: _______
Bail: ______

In-state custody